OHD 045 205 424

EKCO HOUSEWARES INC.

C1.11

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
6950-H Americana Parkway
Reynoldsburg, Ohio 43068

COMM: 614/469-6923 FAX: 614/469-6919

IN REPLY REFER TO:

October 14, 1994

Ms. Sally Averill
Project Manager, Ohio RCRA Permitting Section
US EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Dear Ms. Averill:

This responds to a September 19, 1994, letter we received from Mr. Lawrence J. Bove, plus a September 28, 1994, phone call from Mr. Tim Farrell, both from Roy F. Westin, Inc. Mr. Lawrence and Mr. Farrell requested information on Federal threatened, endangered, proposed, and candidate species in the vicinity of the EKCO Housewares facility (hereafter, the Plant) in Massillon, Stark County, Ohio. Their request relates to a RCRA Hazardous and Solid Waste Amendments (HSWA) action under the Resource Conservation and Recovery Act (RCRA). The Plant is located on the south bank of Newman Creek and east of a tree-covered hill. From the information provided to us, we understand that NPDES discharges occur on Newman Creek.

This technical assistance letter is submitted in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the Endangered Species Act, of 1973, as amended, and is consistent with the intent of the National Environmental Policy Act of 1969, the U. S. Fish and Wildlife Service's Mitigation Policy.

ENDANGERED SPECIES

The Plant lies within the range of the Indiana bat (Myotis sodalis), a federally listed endangered species. Summer habitat requirements for this bat are not well defined but the following are thought to be of importance:

1. Dead trees and snags along riparian corridors especially those with exfoliating bark which may be used as maternity roost areas.

2. Live trees (such as shagbark hickory) which have exfoliating bark.

3. Stream corridors, riparian areas, and nearby woodlots which provide forage sites.

Considering the above items, we recommend that if trees with exfoliating bark (which could be potential roost trees) exist in the project area, they not be cut between April 15 and September 15. If this time restriction is unacceptable, mist netting will need to be done to determine whether Indiana bats are actually present. If they are found to be present, specific recommendations will need to be made at that time. If trees of the kind described above will not be cut (or, will be cut after October and before April) we anticipate the above RCRA-HSWA action(s) would not adversely affect the Indiana bat.

From: RICHARD MATTICK
To: linnear-david
Date: 5/1/96 6:12pm
Subject: EKCO Housewares -Reply -Forwarded

It appears from Gerry's reply to my request for clarification, that he wants EKCO to add an indusrtrial scenario to it's gH2O risk assessment. I insinuate from his comments, that he feels the assessment in it's current form is a bit conservative since it calculates risks looking only at a residential scenario, especially when the site is projected to stay industrial. (I assume the site must have presented enough evidence, i.e, deed restrictions, zoning laws, etc.. to make such a case). Even if the future land use at the site is unknown, a more balanced risk assessment would include both a residential and industrial scenario, allowing for a much more informed risk mangement decision to be made about the site. It would certainly be in EKCO's best interest to provide us with a industrial scenario, especially in light of the high risks that were calculated for the residential scenario. I agree with Gerry that EPA should approach the company with such a recommendation. For this situation, I do not see the benefit of performing an "in-house" screening risk assessment for the industrial scenario if the company is encouraged to complete one. Additionally, If a remediation decision is to be made on the basis of the risk assessment, a screening assessment performed by EPA would not be detailed enough, nor would the company be involved. Additionally, the company would be remiss not to include an industrial scenario to their assessment for a more rounded, complete "scientific" document. If you have any questions or comments about this matter, please contact me.

CC: boyle-joe, phillips-gerald,hamper-george

From: GERALD PHILLIPS
To: MATTICK-RICHARD
Date: 5/1/96 8:21am
Subject: EKCO Housewares -Reply

I have not met with Joe Boyle regarding EKCO Housewares; I have discussed the facility with David and George however. My question is straight forward, ECKO is an industrial facility that expects to remain industrial. Why was a residential risk scenario used since other risk scenarios are available? Why not an industrial scenario with appropriate intake rates and a risk range of 10-4 to 10-6 an option which would be used by CERCLA? Also, what receptors have been identified as at risk, through which pathway? My suggestion was that ECKO redo the risk assessment using these options to confirm that the selected remedy was the most cost effective and environmentally protective option. I'm willing to meet with you to discuss in more detail my concern as you and your management feel is approprate. I'm at 6-0977.

I do not know what Joe's concerns are since he has not discussed the facility with me. You will have to go to Joe for that information.

>>> RICHARD MATTICK 04/30/96 04:41pm >>>
As a risk assessment contact for ECAB, I was recently asked by George Hamper and David Linear to perform a "screening-level" risk assessment for a hypothetical "residential" exposure scenario to soil at the EKCO site per your meeting with Joe Boyle. After reviewing the RFI and the baseline risk assessment for VOCs in groundwater at EKCO, I am in need of further clarification as to what your (and Joe's) concern with the site are. If you would not mind reiterating the risk issues/concerns that were raised at this meeting, including which media you were concerned with (soil and/or groundH2O), it should help me define the most appropriate way to complete/focus the "follow-up" (risk) work required. Thanks. 6-8093

CC: NIEDERGANG-NORMAN

Roy F. Weston, Inc.
1 Weston Way
West Chester, Pennsylvania 19380-1499
® 610-692-3030 • Fax 610-430-3186

November 23, 1994

Ms. Sally Averill, Project Manager
Technical Enforcement Section #1
RCRA Enforcement Branch
U.S. EPA Region V
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Re: Final Baseline Risk Assessment
EKCO Housewares Facility, Massillon, Ohio

Dear Ms. Averill:

On behalf of American Home Products Corporation, (AHPC), Roy F. Weston, Inc. has enclosed three (3) copies of the final risk assessment for the EKCO Housewares Facility. This document reflects revisions per your comments on the draft report (letter to AHPC dated 24 October 1994). A formal response to these comments has been included as Appendix D of the final report.

Please feel free to call me if you have any questions (610-701-7276).

Sincerely,

ROY F. WESTON, INC.

Robert O. Warwick

Robert O. Warwick, Ph.D.
Technical Manager, Risk Assessment

Enclosures

cc: P. McDonald, AHPC
L. Bove, WESTON
P. Cunningham, WESTON
T. Cornuet, WESTON

D.2.8

NOV 24 1994

HRE-8J

Ms. Patricia W. McDonald
American Home Products Corporation
5 Giralda Farms
Madison, New Jersey 07940

RE: Baseline Human Health Risk Assessment
Ekco Housewares, Inc. OHD 045 210 424
205

Dear Ms. McDonald:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the Baseline Human Health Risk Assessment dated August 11, 1994, for Ekco Housewares, Incorporated. Based on this review, the U.S. EPA has determined that the above-referenced risk assessment is deficient. Please submit a revised document within thirty (30) days of receipt of this letter.

U.S. EPA's general and specific comments are attached. If you should have any questions, please contact me at (312) 886-4439.

Sincerely,

Sally Averill, Project Manager
Technical Enforcement Section #1
RCRA Enforcement Branch

bcc: Jeff Swano (with attachments) - PRC

OCT [illegible]

HRE-8J

Ms. Patricia W. McDonald
American Home Products Corporation
5 Giralda Farms
Madison, New Jersey 07940

RE: Baseline Human Health Risk Assessment
Ekco Housewares, Inc. OHD 045 210 424

Dear Ms. McDonald:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the Baseline Human Health Risk Assessment dated August 11, 1994, for Ekco Housewares, Incorporated. Based on this review, the U.S. EPA has determined that the above-referenced risk assessment is deficient. Please submit a revised document within thirty (30) days of receipt of this letter.

U.S. EPA's general and specific comments are attached. If you should have any questions, please contact me at (312) 886-4439.

Sincerely,

Sally Averill, Project Manager
Technical Enforcement Section #1
RCRA Enforcement Branch

bcc: Jeff Swano (with attachments) - PRC

HRE-8J:SAVERILL:10/21/94:f:\user\share\tes.#1\ekco\ekco.ra

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CONCURRENCE REQUESTED FROM REB			
SEC/BR SECRTRY	[illegible]		
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	10/24/94		

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

October 14, 1994

Ms. Sally Averill
U.S. EPA Region 5
77 West Jackson Boulevard
8th Floor
Chicago, IL 60604

Subject: **Technical Review of the "Baseline Human Health Risk Assessment for Volatile Organic Chemicals in Groundwater at Ekco Houseware Facility in Masillon, Ohio**
Contract No. 68-W4-0007, Work Assignment No. R05034

Dear Ms. Averill:

PRC Environmental Management, Inc. (PRC), reviewed the above-referenced document as part of its oversight activities at the Ekco Houseware facility. PRC reviewed the report to determine its technical adequacy and conformance to appropriate U.S. Environmental Protection Agency (EPA) guidance.

In general, PRC found that the Human Health Risk Assessment (HHRA) conducted by Ekco Houseware Facility (Ekco) was conducted following non-conservative assumptions and deviates from EPA guidance regarding selection of exposure pathways and receptors, data evaluations, and calculation of exposure doses. Revision of the HHRA following EPA guidance will result in higher total risk estimates but does not affect risk management decisions, because the risk estimates are above EPA benchmark levels. In addition, the HHRA excludes several complete and significant exposure pathways and the HHRA did not consider all receptors that could potentially be exposed to contaminated groundwater.

PRC's general and specific review comments are enclosed on hard copy and on diskette. If you have any questions, please call me at (312) 946-6469.

Sincerely,

Jeff Swano

Jeff Swano
Project Manager

JSS/cb

Enclosures (2)

cc: Bernie Orenstein, EPA (letter only)
Ed Schuessler, PRC (letter only)
Pinaki Banerjee, PRC

ENCLOSURE

TECHNICAL REVIEW COMMENTS ON THE BASELINE HUMAN HEALTH RISK ASSESSMENT FOR VOLATILE ORGANIC CHEMICALS IN GROUNDWATER AT THE EKCO HOUSEWARE FACILITY IN MASILLON, OHIO

(Four Pages)

TECHNICAL REVIEW COMMENTS ON THE BASELINE HUMAN HEALTH RISK ASSESSMENT FOR VOLATILE ORGANIC CHEMICALS IN GROUNDWATER AT THE EKCO HOUSEWARE FACILITY IN MASILLON, OHIO

PRC Environmental Management, Inc. (PRC), was tasked under Work Assignment No. R05034, under the Resource Conservation and Recovery Act (RCRA) Enforcement and Permitting Assistance (REPA) contract, Contract No. 68-W4-0007, to review the above referenced report. PRC reviewed the report for its technical adequacy and conformance to appropriate U.S. Environmental Protection Agency (EPA) guidelines, including primarily Risk Assessment Guidance for Superfund: Volume I-Human Health Evaluation Manual (Part B, Development of Risk-Based Preliminary Remediation Goals, Interim, 1991). In general, the report deviates from EPA guidelines and is not adequately prepared. PRC identified a number of revisions that should be made in the report. PRC's general and specific comments are presented below.

GENERAL COMMENTS

1. The Human Health Risk Assessment (HHRA) for the Ekco Houseware Facility (Ekco) was conducted following non-conservative assumptions and deviates from EPA guidance regarding selection of exposure pathways and receptors, data evaluations, and calculation of exposure doses. However, human health risks from exposure to contaminated groundwater still exceed carcinogenic risks of 1E-03 and noncarcinogenic risks as indicated by a hazard index of 1. Such carcinogenic risks are higher than the benchmark risk of 1E-04 that EPA uses for taking corrective actions. Revision of the HHRA following EPA guidance will result in higher total risk estimates but does not affect risk management decisions. However, the remaining general and specific comments are provided to assist in the development of a technically valid and complete document.

2. The HHRA excludes several complete and significant exposure pathways. For example, garden produce ingestion was only evaluated for the upper unit that contains wells in the shallow and the intermediate aquifers. The bedrock aquifer (lower unit) which has sufficient yield for probable future on-site domestic use, was not evaluated as a source for irrigating garden plots. This omission is expected to result in underestimation of total risk. Another

significant omission is exposure to soil gas that is being emitted from the upper unit. Concentrations of several volatile organic compounds (VOCs) such as trichloroethene and 1,1,1-trichloroethane are higher than 1 percent of water solubility indicating the potential for their presence as dense non-aqueous phase liquids (DNAPLs). In addition to their presence in the groundwater, these DNAPLs may exist in the unsaturated zone and may act as continuing sources for groundwater contamination. Due to fluctuations in the water table, significant VOC emissions may occur from groundwater to the unsaturated zone. The VOCs in the vapor phase can potentially enter residences through basements that could extend to depths of 12 feet below the ground surface. Ekco should include ingestion of garden produce with water from the lower unit and inhalation exposure to VOCs from the upper unit as exposure pathways.

3. The HHRA did not consider all receptors that could potentially be exposed to contaminated groundwater. For example, carcinogenic risks were only evaluated for adults. Although noncarcinogenic risks to children were evaluated, the reasons for excluding carcinogenic risks to children were not provided. By excluding sensitive receptors such as children, total risk will be underestimated. Therefore, carcinogenic risks to children should be evaluated and included in the discussion.

4. Several deviations from EPA guidance were noted in data evaluation procedures that Ekco followed. For the upper unit, Ekco used data generated during several sampling events that were conducted in 1988, 1991, 1992, and 1994. EPA guidance recommends only using data from the most recent sampling event. Data from previous sampling events should be analyzed to identify trends and should be discussed in the uncertainty analysis. Ekco should justify using data from different sampling events or should use data generated from the most recent sampling event.

Is the data comparable?

Furthermore, for nondetects, Ekco calculated proxy concentrations equal to one-half of the sample quantitation limits (SQLs). However, if such proxy concentrations were higher than any detected concentrations in that medium, then the proxy concentration was excluded from exposure point concentration calculations. This procedure is not in accordance with EPA guidance. Analytical laboratories may report varying SQLs for different batches of samples.

However, a proxy concentration calculated by using data generated from a specific batch of samples that were analyzed should be valid data, even if it exceeds concentrations that were detected when a separate batch of samples was analyzed. Ekco should revise its calculations to include all valid proxy concentrations.

5. Ekco should provide further information to justify considering the shallow and intermediate aquifers as one unit. The wells listed in the text and the data presented in the tables do not identify wells as belonging to either the shallow or the intermediate unit. Although the units may be interconnected at some locations, concentration levels of chemicals could be considerably different. Furthermore, the yield rates and use of the two aquifers may be different and could result in different exposure pathways.

6. Current risks to workers at the facility were not evaluated. The report indicates that groundwater at the facility is presently being used for production purposes, but does not identify or exclude possible exposure pathways to workers. Ekco should identify if workers could be exposed to contaminated groundwater in the course of routine activities and Ekco should evaluate current health risks to industrial workers at the facility.

7. Ekco did not calculate the exposure dose to groundwater contaminants through inhalation. The HHRA assumed that the inhalation exposure dose is equivalent to the dose received via ingestion. However, for some chemicals, the inhalation exposure dose could be considerably greater than the ingestion dose. Ekco should therefore calculate exposure doses via inhalation for all VOCs for which risk factors are available.

8. The HHRA did not include a discussion of and calculations associated with central tendency exposure conditions. Recent EPA guidance recommends evaluating central tendency exposure conditions in addition to assessing reasonable maximum exposure conditions to provide information useful for evaluating uncertainties. Ekco should include an evaluation of central tendency exposure conditions.

SPECIFIC COMMENTS

1. **Executive Summary, Page ES-11, Paragraph 0**. The second to last sentence states that the pump and treat system is expected to substantially reduce potential exposure concentrations. It should be noted that several major contaminants driving health risks are present at very high concentrations thereby indicating the potential for the presence of DNAPLs. DNAPLs are known to not respond to pump and treat remediations and may continue to act as sources of groundwater contamination over an extended period of time. Further investigation should be conducted to confirm or deny the presence of DNAPLs at this facility. Alternative corrective measures should be considered if the presence of DNAPLs is confirmed.

2. **Section 2, Page 2-1, Paragraph 1**. This paragraph states that for upper unit wells, data are available from sampling events conducted in 1988, 1991, and 1992. However, data presented in Appendix A indicate that for the L series wells, data were collected in 1994. Ekco should clarify which data were used in the HHRA. If data were generated in 1994, they should be used rather than older data.

3. **Table 3-4**. Soil-water partition coefficient values were calculated using a total organic carbon (TOC) content value of 2 percent. Ekco should justify using this TOC value.

4. **Appendix A**. Identical data on R series wells appear with report dates of 05/20/94 and 06/22/94. This discrepancy should be resolved. Furthermore, sample analysis logs list chemical concentrations without identifying the chemical or chemicals that are represented. The specific chemicals for which concentrations are listed should be identified.

   Data from numerous wells such as I-8, I-9, I-11, I-12, I-13, R-12, S-11, S-12 are listed in this Appendix, but these wells were not identified in the text. It is not clear if these data were used in the HHRA. Ekco should clearly identify all data used in the HHRA.

OHD 045 205 424

G

WESTON
MANAGERS DESIGNERS/CONSULTANTS
Roy F. Weston, Inc.
1 Weston Way
West Chester, Pennsylvania 19380-1499
®610-701-3000 • Fax 610-701-3186

19 September 1994

Buddy Fazio
Endangered Species Coordinator
U.S. Fish and Wildlife
Reynoldsburg Field Office
6950 American Parkway, Suite H
Reynoldsburg, OH 43068

RE: **§ 7 Endangered Species Act**
Listed Species Screening
EKCO Housewares, Inc.
Massillion, Ohio
~~**OHD015205424**~~

Dear Mr. Fazio:

EKCO Housewares, Inc. has been required to conduct corrective action under the Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA). EKCO Housewares, Inc. is located in Stark county and is identified as the EKCO facility on the attached excerpt of the Massillon Quadrangle, United States Geological Survey (USGS) topographic map (Figure 1-1).

According to Section 7 of the Endangered Species Act (ESA), the Fish and Wildlife Service (FWS) of the U.S. Department of Interior must be contacted regarding the status of protected species and their critical habitats prior to a Federal Agency action. The Imposition of corrective action by the U.S. EPA on EKCO Housewares, Inc. would constitute such an action. As a result, the U.S. EPA is requiring EKCO Housewares, Inc. to obtain information regarding protected species and their critical habitats in the proximity of the corrective action. Additionally, as a private entity, EKCO Housewares, Inc. has responsibilities under Section 9 of the ESA not to affect listed species.

Roy F. Weston, Inc., on behalf of EKCO Housewares, Inc., is currently conducting a screening-level evaluation to determine whether there are any ESA issues associated with the corrective action. Accordingly, the purpose of this letter is to solicit information from

the FWS concerning the occurrence of any endangered, threatened, proposed, or candidate species or their critical habitats in the proximity of the area associated with the corrective action. Since the FWS is the recognized authority concerning protected species and their critical habitats, EKCO Housewares, Inc. is enclosing with this letter a summary of the known nature and extent of contamination (Attachment 1) and a summary of the potential activities that would accompany the corrective action (Attachment 2). It expected that corrective actions would be limited to soils and ground water within the indicated cross hatched area[1].

If there are any occurrences, EKCO Housewares, Inc. requires that the FWS determine whether an affect would, would not, or might be anticipated for each occurrence. EKCO Housewares, Inc. will not investigate any further at this time, those occurrences that would not be anticipated by the FWS to be definitely or potentially affected by the corrective action. If the FWS determines that an endangered, threatened, or proposed species or its critical habitat would or might be affected by the corrective action, the U.S. EPA and FWS will decide whether EKCO Housewares, Inc. will be required to conduct a biological assessment. The objective of the biological assessment would be to determine the potential magnitude of affect that the corrective action would have on the protected species or their critical habitats. Additionally, the U.S. EPA might enter into either informal or formal consultation with the FWS. **Please note that corrective action is a multi-phased project involving multiple U.S. EPA approvals over a year or more. FWS identification of proposed and candidate species relative to this type of project is critical to ensure that species protection goals are met.**

---

[1] *NOTE: In some circumstances, FWS may have previously been contracted as part of a multi-media initiative or under an expanded public participation process, but this does not satisfy § 7 of the ESA. In addition, "Screening letters" or public notices may have been sent to FWS on previous actions, with no response or a negative response. This also is not sufficient to satisfy § 7 of the ESA for the current action; FWS must be recontacted prior to each action. Be aware that FWS may state specifically in their response letter that the letter does not fulfill the requirements of § 7 of the ESA. The burden is on U.S. EPA to ensure that no listed species is affected.*

Please send all correspondence concerning this matter to the U.S. EPA Project Manager, Sally Averill and me. Additionally, please send a copy of all correspondence to the ESA. Coordinator for the Office of RCRA, Diane Sharrow. The address of the two U.S. EPA contacts is as follows:

Office of RCRA
U.S. EPA Region 5
77 W. Jackson Boulevard
Chicago, IL 60604

If you have any questions regarding this matter, you can contact me at (610) 701-3020 or the U.S. EPA's Project Manager, Sally Averill, at 806-4439.

Sincerely yours,

ROY F. WESTON, INC.

Lawrence J. Bove
Principal Project Manager

LJB/mtl

enclosures

cc: Sally Averill, RPB
C. Maurice, RPB
D. Sharrow, REB
P. Tag, EKCO
P. McDonald, AHPC

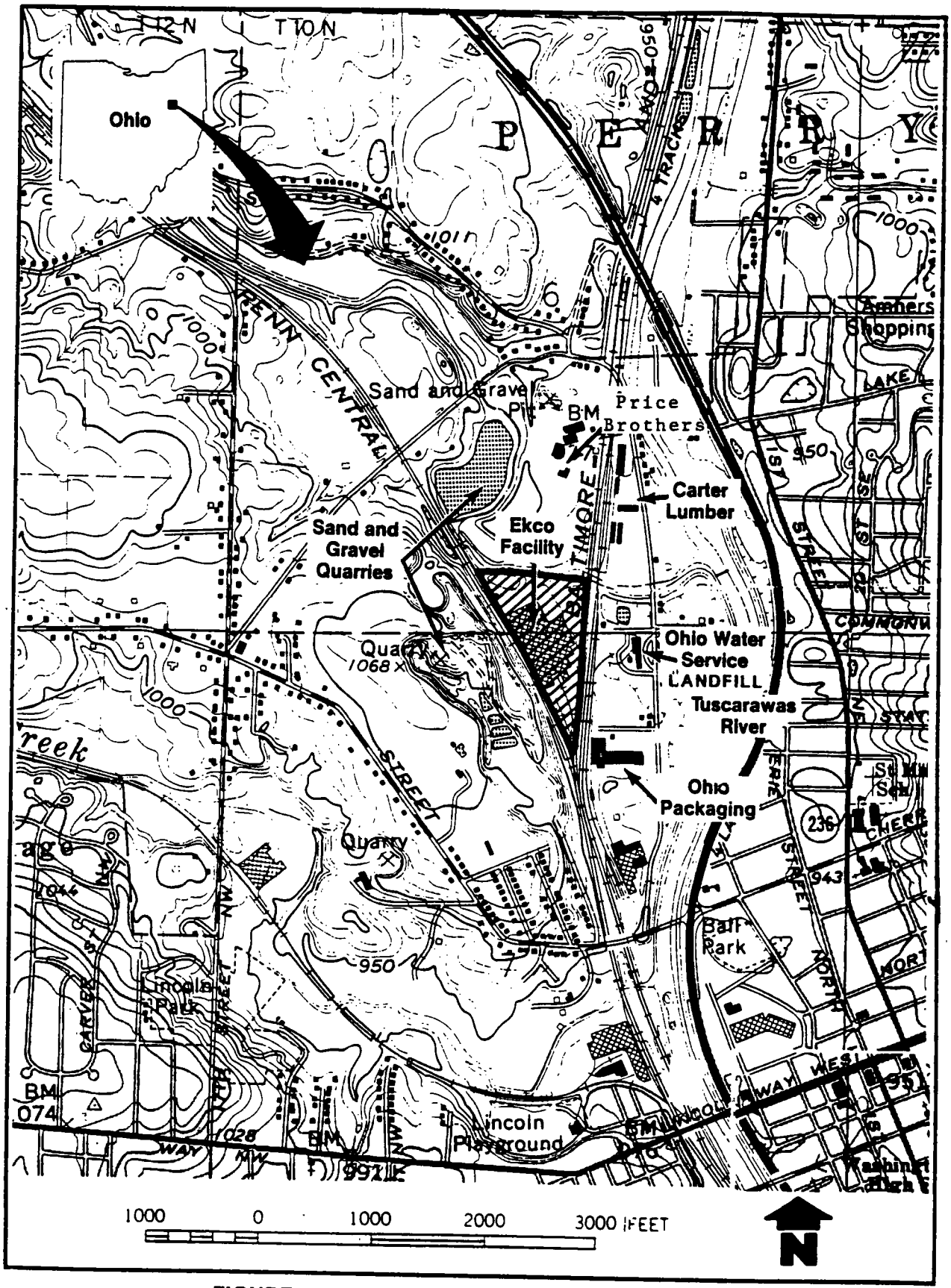

FIGURE 1-1 SITE LOCATION MAP
EKCO HOUSEWARES, INC., MASSILLON, OHIO
(Ref. 7.5 Minute Massillon Quad, Ohio, 1978)

Attachment 1
Summary of the Nature and Extent of Contamination at the
Ekco Housewares, Inc. Facility
Massillon, Ohio

Volatile organic compounds (VOCs) have been detected in groundwater and soil samples at the Ekco Housewares, Inc. facility in Massillon, Ohio. The primary constituents detected in soils and their maximum concentrations are presented below:

- trichloroethene (TCE) : 140 mg/kg
- 1,1-dichloroethene (1,1-DCE) : 0.14 mg/kg
- 1,2-dichloroethene (1,2-DCE) : 3.4 mg/kg
- 1,1,1-trichloroethane (1,1,1-TCA) : 4.0 mg/kg
- 1,1-dichloroethane (1,1-DCA) : 0.34 mg/kg

These areas of soil contamination were present in the immediate vicinity of the main building.

The primary constituents of concern in groundwater and their maximum concentrations are presented below:

- tetrachloroethene (PCE) : 19 ug/L
- TCE : 25,000 ug/L
- 1,1-DCE : 1,900 ug/L
- 1,2-DCE : 480 ug/L
- vinyl chloride : 21 ug/L
- 1,1,1-TCA :9,700 ug/L

Attachment 2
Summary of Potential Corrective Actions
Ekco Housewares, Inc. Facility
Massillon, Ohio

There are currently two on-site production wells being used as recovery wells. These wells pump approximately 540 gallons of water per minute. Total VOC levels in the recovered groundwater range from 1 to 2 mg/kg. This groundwater is treated using an air stripper to remove VOCs. The treated groundwater is subsequently discharged through an NPDES-permitted outfall to Newman Creek.

Potential corrective actions for groundwater are described below:

- Alternative GW-1: No action - With the no action alternative, the current groundwater recovery operation would cease. Site groundwater would be uncontrolled. No groundwater monitoring would be performed.

- Alternative GW-2: Installation of additional recovery wells - Operation of the existing recovery wells would continue. An additional two recovery wells would be installed in the shallow and intermediate water-bearing zones. The existing air stripper would be used to treat the recovered groundwater.

- Alternative GW-3: Installation of additional recovery wells and pulse pumping of bedrock wells - Three additional recovery wells would be installed in the shallow and intermediate water-bearing zones. Operation of the existing recovery system would be modified so that each of the recovery wells would be operated on an alternating basis. The average flow rate of the system would be reduced, and higher VOC removal rates are predicted. The object would be to increase the overall mass removal rate of VOCs. The existing air stripper would be used to treat the recovered groundwater.

- Alternative GW-4 - Pulse Pumping - Operation of the existing recovery system would be modified so that each of the recovery wells would be operated on an alternating basis. The average flow rate of the system would be reduced, and higher VOC removal rates are predicted. The object would be to increase the overall mass removal rate of VOCs. The existing air stripper would be used to treat the recovered groundwater.

- Alternative GW-5 - Use of additional recovery wells and pulse pumping of bedrock wells. This alternative is functionally equivalent to alternative GW-3.

- Alternative GW-6 - Air sparging of shallow groundwater and pulse pumping of bedrock wells - An air sparging system would be installed to remediate the area of highest groundwater contamination. Operation of the existing recovery system would be modified so that the recovery wells would be operated on an alternating basis. The existing air stripper would be used to treat the recovered groundwater. Granular activated carbon would used to

treat vapor removed using the air sparging system.

Corrective action alternatives were separately developed for soils underneath the main building and soils outside the building. These potential actions can be simplified into three alternatives which are discussed below:

- No action - Contaminated soil would be left in place.
- Institutional action - Contaminated soils that are accessible would be fenced off to prevent direct contact.
- Soil vapor extraction (SVE) - Under this alternative, VOCs in soil would be mechanically removed by drawing air through the soil. VOCs volatilize into the air as the air moves through the soil. This is accomplished by installing a series of vents in the unsaturated zone and applying a vacuum to the vents. The VOC-laden air stream in then collected and treated using granular activated carbon, if necessary.
- Ex-situ volatilization - Under this alternative, contaminated soil would be excavated and placed on an impervious surface for treatment. The VOCs would be removed through a series of pipes connected to a vacuum pump. The removed VOCs would be treated using granular activated carbon, if necessary. Following successful treatment, the soil would be returned to the excavation.
- Low temperature thermal treatment - Under this alternative, contaminated soil would be excavated. The soil would be heated within the treatment unit driving off an VOCs. The VOCs would be collected for subsequent treatment. Following successful treatment, the soil would be returned to the excavation.
- Off-site disposal/incineration - Under this alternative, contaminated soil would be excavated and sent off-site to a landfill or incinerator.

OHD 045 205
424

SEP 02 1994

HRE-8J

Ms. Pat McDonald
American Home Products
Five Giralda Farms
Madison, New Jersey 07940

Re : Endangered Species Act Letter

Dear Ms. McDonald:

Enclosed is a copy of a letter that American Home Products, Incorporated must submit to U.S. Fish and Wildlife Service of the U.S. Department of the Interior in accordance with Section 7 and Section 9 of the Endangered Species Act.

The purpose of this letter is for American Home Products, Incorporated to obtain information regarding protected species and their critical habitats in the vicinity of your facility.

If you should have any questions concerning this letter, please contact me at (312) 886-4439.

Sincerely yours,

Sally Averill, Project Manager
RCRA Enforcement Branch

Enclosure

HRE-8J:SA/be:6-4439:9/1/94:Filename:AHP:ESA

OFFICIAL FILE COPY

CONCURRENCE REQUESTED FROM REB			
SEC/BR SECRTRY	BE 9/1/94		
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	SA 9/1/94		

OHD 045 205 424

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

~~D.3.4~~

REPLY TO THE ATTENTION OF:

HRE-8J

JUN 22 1994

Ms. Patricia W. McDonald
American Home Products Corporation
5 Giralda Farms
Madison, New Jersey 07940

Re: Risk Assessment
Ekco Housewares, Inc.
OHD 045 210 424

Dear Ms. McDonald:

The United States Environmental Protection Agency (U.S. EPA) has determined that it is necessary for Ekco Housewares to conduct a Risk Assessment to determine the groundwater risks for the cumulative volatile organic compounds associated with the Ekco Facility in Massillon, Ohio.

To complete this task it will be necessary to analyze the database for groundwater for entry into the risk assessment as recommended in the U.S. EPA guidance *Risk Assessment Guidance for Superfund, Vol. I - Human Health Evaluation Manual (Part A)*. All chemicals detected above background must be entered into the risk assessment. Adequate evidence needs to be presented to demonstrate that the background location(s) have not been affected by the chemical contaminant releases.

The residential scenario for exposure to contaminated groundwater as drinking water should be applied to the analytical data. To model this scenario, the same U.S. EPA guidance given above should be consulted as well as the following: *Exposure Factors Handbook* (EPA/600/8-89/043, March 1990) and *Dermal Exposure Assessment: Principles and Applications* (EPA/600/8-91/01/011B, January 1992). The pathways for exposure should include ingestion from drinking, inhalation of volatiles from household water use, and dermal absorption from bathing. The cumulative Cancer Risk and cumulative Hazard Index from exposure to all chemicals of concern from all relevant pathways should be calculated for the resident receptor.

Ekco Housewares must submit a risk assessment within 45 days of receipt of this letter. If you should have any questions concerning this matter, please contact me at (312) 886-4439.

Sincerely yours,

Sally Averill, Project Manager
Technical Enforcement Section #1
RCRA Enforcement Branch

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